

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WYETH,)	
)	
)	
Plaintiff,)	
)	Civil Action No.: 06-222 JJF
v.)	
)	REDACTED VERSION
IMPAX LABORATORIES, INC.,)	
)	
Defendant.)	
_____)	

**DECLARATION OF MARY B. MATTERER IN SUPPORT
OF DEFENDANT IMPAX LABORATORIES, INC.'S REPLY
BRIEF IN SUPPORT OF MOTION TO COMPEL WYETH
TO PRODUCE PROPERLY PREPARED RULE 30(b)(6) WITNESSES**

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Original Dated: July 5, 2007
Redacted Version: July 12, 2007

I, Mary B. Matterer, declare:

1. I am an attorney at the law firm of Morris James LLP, counsel of record for Defendant Impax Laboratories, Inc. ("Impax") in the above-referenced case. I have personal knowledge of the facts set forth in this Declaration.

2. I submit this Declaration in support of the Reply Brief In Support of Defendant Impax Laboratories, Inc.'s Motion to Compel Wyeth To Produce Properly Prepared Rule 30(b)(6) Witnesses.

3. A true and correct copy (with emphasis added in bold type by counsel) of excerpts from the May 31, 2007 30(b)(6) deposition of Dr. Richard Kavoussi, M.D. is attached hereto as Exhibit A.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at Wilmington, Delaware on July 5, 2007.



MARY B. MATTERER (I.D. NO. 2696)

EXHIBIT A

**ENTIRE EXHIBIT
REDACTED**